

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JENNIFER BABCOCK, an individual;
on behalf of herself and all
other similarly situated consumers,

Plaintiff,

-against-

ANSWER

14-CV-3124

C.TECH COLLECTIONS, INC., a New
York Corporation; JOEL R.
MARCHIANO, individually and in
his official capacity; JAMES W.
ARGENT, individually and in his
official capacity; CYNTHIA A.
MICHELS, individually and in her
official capacity; and JOHN AND
JANE DOES NUMBERS 1 THROUGH 25,
Defendants.

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Defendants C.TECH COLLECTIONS, INC., JOEL R. MARCHIANO, JAMES
W. ARGENT AND CYNTHIA A. MICHELS, by their attorney, Arthur Sanders,
Esq., answers plaintiff's complaint as follows:

1. Defendants acknowledge being sued pursuant to the Fair
Debt Collection Practices Act (FDCPA) and State law, but deny any
violation thereof.

2. Defendants acknowledge being sued pursuant to the Fair
Debt Collection Practices Act (FDCPA), but deny any violation thereof.

3. The allegations in this paragraph are not directed at the
defendants and do not require any admission or denial.

4. The allegations in this paragraph are not directed at the defendants and do not require any admission or denial.

5. The allegations in this paragraph are not directed at the defendants and do not require any admission or denial.

6. The allegations in this paragraph are not directed at the defendants and do not require any admission or denial.

7. The allegations in this paragraph are not directed at the defendants and do not require any admission or denial.

8. Defendants acknowledge being sued pursuant to the Fair Debt Collection Practices Act (FDCPA) and State law, but deny any violation thereof.

9. Defendants admit the allegations contained paragraph "9" of the complaint.

10. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "10" of the complaint.

11. Defendants admit the allegations contained in paragraph "11" of the complaint

12. Defendants admit the allegations contained in paragraph "12" of the complaint.

13. Defendants admit the allegations contained in paragraph "13" of the complaint.

14. Defendants admit the allegations contained in paragraph "14" of the complaint.

15. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "15" of the complaint.

16. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "16" of the complaint.

17. Defendants admit the allegations contained in paragraph "17" of the complaint.

18. Defendants deny each and every allegation contained in paragraph "18" of the complaint.

19. Defendants deny each and every allegation contained in paragraph "19" of the complaint.

20. Defendants admit the allegations contained in paragraph "20" of the complaint.

21. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "21" of the complaint.

22. Defendants admit the allegations contained in paragraph "22" of the complaint.

23. Defendants admit the allegation contained in paragraph "23" of the complaint.

24. Defendants admit the allegations contained in paragraph "24" of the complaint.

25. Defendants admit the allegations contained in paragraph "25" of the complaint.

26. Defendants admit the allegations contained in paragraph "26" of the complaint.

27. Defendants admit the allegations contained in paragraph "27" of the complaint.

28. Defendants admit the allegations contained in paragraph "28" of the complaint.

29. Defendants deny each and every allegation contained in paragraph "29" of the complaint.

30. Defendants admit sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as the allegations contained in paragraph "30" of the complaint, as plaintiff's complaint does not appear to have Exhibit "A" attached to it.

31. Defendants admit sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "31" of the complaint.

32. Defendants admit sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "32" of the complaint.

33. Defendants admit the allegations contained in paragraph "33" of the complaint.

34. Defendants admit that the letter sent to the plaintiff was computer generated, but otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "34" of the complaint.

35. Defendants admit sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to the allegation contained in paragraph "35" of the complaint.

36. Defendants admit sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to the allegations contained in paragraph "36" of the complaint.

37. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "37" of the complaint.

38. Defendants deny each and every allegation contained in paragraph "38" of the complaint.

39. Defendants deny each and every allegation contained in paragraph "39" of the complaint.

40. Defendants deny each and every allegation contained in paragraph "40" of the complaint.

41. Defendants deny each and every allegation contained in paragraph "41" of the complaint.

42. Defendants deny each and every allegation contained in paragraph "42" of the complaint.

43. Defendants deny each and every allegation contained in paragraph "43" of the complaint.

44. Defendants admit the allegations contained in paragraph "44" of the complaint.

45. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "45" of the complaint.

46. Defendants deny each and every allegation contained in paragraph "46" of the complaint.

47. Defendants deny each and every allegation contained in paragraph "47" of the complaint.

48. Defendants deny each and every allegation contained in paragraph "48" of the complaint.

49. Defendants deny each and every allegation contained in paragraph "49" of the complaint.

50. Defendants deny each and every allegation contained in paragraph "50" of the complaint.

51. Defendants admit the allegations contained in paragraph "51" of the complaint.

52. Defendants acknowledge that this suit is brought as a putative class action, but denies that class certification is proper or appropriate in this matter.

53. Defendants acknowledge that this suit is brought as a putative class action, but denies that class certification is proper or appropriate in this matter.

54. Defendants acknowledge that this suit is brought as a putative class action, but denies that class certification is proper or appropriate in this matter.

55. Defendants acknowledge that this suit is brought and as a putative class action, but denies that class certification is proper or appropriate in this matter.

56. Defendants admit the allegations contained in paragraph "56" of the complaint.

57. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "57" of the complaint.

58. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "58" of the complaint.

59. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "59" of the complaint.

60. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "60" of the complaint.

61. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "61" of the complaint.

62. Defendants deny each and every allegation contained in paragraph "62" of the complaint.

63. Defendants deny each and every allegation contained in paragraph "63" of the complaint.

64. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "65" of the complaint.

65. Defendants repeat and reallege their previous admissions and denials contained in paragraphs "1" through "64" of the complaint.

66. Defendants deny each and every allegation contained in paragraph "66" of the complaint.

67. Defendants repeat and reallege their previous admissions and denials contained in paragraphs "1" through "66" of the complaint.

68. Defendants deny each and every allegation contained in paragraph "68" of the complaint.

69. Defendants deny each and every allegation contained in paragraph "69" of the complaint.

70. Defendants deny each and every allegation contained in paragraph "70" of the complaint.

71. Defendants deny each and every allegation contained in paragraph "71" of the complaint.

72. Defendants deny each and every allegation contained in paragraph "72" of the complaint.

73. Defendants deny each and every allegation contained in paragraph "73" of the complaint.

74. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "74" of the complaint.

75. Defendants deny each and every allegation contained in paragraph "75" of the complaint.

76. Defendants deny each and every allegation contained in paragraph "76" of the complaint.

77. Defendants deny knowledge or information sufficient to form a belief as to the allegations contained in paragraph "77" of the complaint.

78. Defendants deny each and every allegation contained in paragraph "78" of the complaint.

79. Defendants deny each and every allegation contained in paragraph "79" of the complaint.

80. Defendants deny each and every allegation contained in paragraph "80" of the complaint.

WHEREFORE, defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New City, NY
June 26, 2014

/S/ARTHUR SANDERS

ARTHUR SANDERS, ESQ.
Attorney for defendant
30 South Main Street
New City, NY 10956
845-499-2990

TO:

ABRAHAM KLEINMAN, ESQ.
KLEINMAN LLC
626 RXR Plaza
Uniondale, NY 11556